

SMITH & KING^{LLC}

www.SmithandKinglaw.com

LONG ISLAND OFFICE:
666 OLD COUNTRY ROAD
SUITE 305
GARDEN CITY, N.Y. 11530
Telephone: (516) 213-0018
Fax: (917) 591-3244

NEW YORK CITY OFFICE:*
900 THIRD AVENUE, 13TH FLOOR
NEW YORK, N.Y. 10022
Telephone: (212) 681-2800
Fax: (917) 591-3244
*Please send all mail to the Garden City Office

David S. Smith, Esq.[†]
Brian King, Esq. (1978-2021)
[†]Admitted in New York and California

December 3, 2024

Via ECF
Honorable Allyne Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Feng Jiang
24-CR-264

Your Honor,

I represent defendant Feng Jiang in the above-referenced matter. I write to respectfully request that the Court appearance scheduled for this Thursday, December 5, 2024, be adjourned until January 9, 2025. This appearance will be the third one before Your Honor and one previous adjournment request has been filed in the past.

After extensive plea negotiations, the Government has presented Mr. Jiang with a plea agreement that we are currently in the process of reviewing. The parties believe we are close to a resolution and I respectfully request that this matter be adjourned until January 9, 2025, so that the plea agreement can be thoroughly reviewed with Mr. Jiang and any outstanding issues can be finalized with the Government. I believe that this adjournment is in my client's best interest and that the ends of justice served by granting it outweigh the best interest of the public and my client in a speedy trial. Accordingly, I respectfully request that this adjournment, if granted, be excluded for speedy trial purposes.

I have spoken with AUSA Patrick Campbell and he consents to this request.

Respectfully submitted,



David Scott Smith, Esq.

Cc: AUSA Patrick Campbell (via ECF)